

Raymond|Coleman|Heinold LLP

attorneys at law

325 New Albany Road
Moorestown, NJ 08057

Tel. 856.222.0100
Fax 856.222.0411

Stephen G. Raymond
Thomas J. Coleman, III*
Douglas L. Heinold
Janice L. Heinold*
Stephen E. Raymond*

Gina M. LaPlaca◊

William H. Mengess‡
Edward A. Kondracki^

*Also admitted to practice in the
Commonwealth of Pennsylvania
◊Also admitted to practice
in the State of New York
^Of Counsel

seraymond@rclawnj.com

March 7, 2022

[*Via ECF Filing Only*]

Honorable Renee Mari Bumb, U.S.D.J.
Mitchell H. Cohen Building
4th & Cooper Street
Camden, New Jersey 08101

**Re: Franklin v. Riverside Township, et al. (Docket No. 17-08838)
Settlement Processing**

Dear Judge Bumb,

As Your Honor is likely aware, at the settlement conference with the Honorable Ann Marie Donio, U.S.M.J., the parties were able to reach an amicable resolution as to the substantive issues in this case.

However, due to the fact that the Township is insured through the Burlington County Joint Insurance Fund and the excess carrier, the Municipal Excess Liability (“MEL”) fund, the settlement must be voted on and approved by the MEL. To be clear, we do not anticipate any issue with approval of this settlement. While we do not want to characterize the process as a rubber stamp, Chris Botta, Liability Claims Counsel for the MEL took part in the settlement conference and will be presenting the settlement for approval. The MEL has historically accepted his recommendations, and there is no reason to believe this case will be an exception to the rule. Unfortunately, the MEL only meets once every two months and just had a meeting last week. Accordingly, the next meeting of the MEL is not until May 4, 2022.

As Your Honor is aware, as a result of the currently scheduled trial date of April 4, 2022, the parties have various deadlines approaching for the submission of pre-trial briefs, jury instructions, verdict sheet, etc. In light of the settlement, and despite the procedural aspect referenced above, the parties are mutually requesting that this matter be removed from the trial list, without prejudice to reinstate, and that those dates be excused.

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Should Your Honor have any questions in this regard, please do not hesitate to contact the parties.

Very truly yours,
RAYMOND COLEMAN HEINOLD
Attorney for Defendants, Megara and Marano



Stephen E. Raymond

c.c. Charles Horn, Esquire, *via ECF only*